

Abran E. Vigil  
Nevada Bar No. 7548  
Russell J. Burke  
Nevada Bar No. 12710  
BALLARD SPAHR LLP  
1980 Festival Plaza Drive, Suite 900  
Las Vegas, Nevada 89135  
Telephone: (702) 471-7000  
Facsimile: (702) 471-7070  
vigila@ballardspahr.com  
burker@ballardspahr.com

*Attorneys for Plaintiff/Counter-Defendant*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JPMORGAN CHASE BANK, N.A.,

Case No.: 2:16-cv-02781-RFB-PAL

Plaintiff,

vs.

**STIPULATION AND ORDER TO  
EXTEND SCHEDULING ORDER  
DEADLINES BY 30 DAYS**

SFR INVESTMENTS POOL 1, LLC, a  
Nevada limited liability company; and  
SUTTER CREEK HOMEOWNERS  
ASSOCIATION, a Nevada non-profit  
corporation,

**(Second Request)**

Defendants.

SFR INVESTMENTS POOL 1, LLC, a  
Nevada limited liability company,

Counterclaimant,

vs.

JPMORGAN CHASE BANK, N.A.;

Counter-Defendant.

SFR INVESTMENTS POOL 1, LLC, a  
Nevada limited liability company,

Cross-Claimant,

vs.

WAI CHUNG NG, an individual, Cross-  
Defendant.

Pursuant to LR IA 6-1 and LR 26-4, Plaintiff/Counter-Defendant JPMorgan  
Chase Bank, N.A. ("Chase"), Defendant/Counterclaimant/Cross-Claimant SFR

Ballard Spahr LLP  
 1980 Festival Plaza Drive, Suite 900  
 Las Vegas, Nevada 89135  
 (702) 471-7000

Investments Pool 1, LLC (“SFR”), and Defendant Sutter Creek Homeowners’ Association (“Sutter Creek”),<sup>1</sup> by and through their respective counsel of record, stipulate and request that this Court extend discovery and dispositive motion deadlines in the above-captioned case for an additional 30 days, to permit the parties to complete party depositions, and specifically the deposition of Chase, whose designated witness who underwent significant surgery in December and from which she will not have recuperated until February 2018. The parties have conferred and agree that this brief extension is the most reasonable way to complete discovery in this case, including so that Chase’s designated witness has sufficient time to attend to necessary medical treatment.

This is the parties’ second request for an extension to the scheduling order deadlines, which were submitted in compliance with LR 26-1. The parties make this request in good faith and not for purposes of delay.

**A. Discovery Completed to Date**

To date, Chase has served the following discovery: initial disclosures; initial expert disclosure; first set of requests for production and interrogatories to SFR; notice of Rule 30(b)(6) deposition of SFR; first set of requests for production and interrogatories to Sutter Creek; and notice of Rule 30(b)(6) deposition of Sutter Creek.

To date, SFR has served the following discovery: initial disclosures; first set of requests for production, interrogatories, and requests for admissions to Chase; and notice of Rule 30(b)(6) deposition of Chase. SFR has also responded to Chase’s requests for production and interrogatories to SFR.

To date Sutter Creek has served the following discovery: initial disclosures.

**B. Specific Description of Discovery that Remains to be Completed**

SFR has also noticed a Rule 30(b)(6) deposition of Chase. As discussed below,

---

<sup>1</sup> Although Cross-Defendant Wai Chung Ng has been served in this case, (*see* ECF No. 29), Mr. Ng has not otherwise appeared, and, therefore, this stipulation and order is submitted without his signature.

1 however, the parties seek to reschedule Chase's to occur after the current discovery  
2 cutoff of February 28, 2018.<sup>2</sup>

3 Chase has also noticed the Rule 30(b)(6) deposition of SFR and Sutter Creek.

4 **C. Good Cause Exists for the Requested Extension**

5 SFR has noticed Chase's deposition for March 20, 2018, which is after the  
6 current close of discovery. Chase's Rule 30(b)(6) designee is not available until  
7 March due to significant surgery that occurred in December. The parties have met  
8 and conferred about rescheduling Chase's deposition in this lawsuit to take place on  
9 March 20, 2018, when the Chase designee should be recuperated from surgery and  
10 able to travel to Las Vegas. This is the parties' second request to extend the  
11 standard, 180-day discovery period in this case, and they seek the extension so that  
12 Chase's designated witness may have an opportunity to receive necessary medical  
13 treatment and recover from the same. The parties have diligently engaged in  
14 discovery to date and seek this extension in good faith, and do not anticipate any  
15 further extensions of the discovery deadlines.

16  
17  
18 *[Remainder of Page Intentionally Left Blank]*  
19  
20  
21  
22  
23  
24  
25  
26  
27

28 

---

<sup>2</sup> The parties further reserve their rights to meet and confer and, if necessary, engage in motion practice regarding any discovery issues that may arise.

**D. Proposed Discovery Deadlines**

The parties request an order extending the close of discovery, the deadline to file dispositive motions, and the deadline to file a pre-trial order by 30 days.

Event	Current Deadline <sup>3</sup>	New Deadline
Close of Discovery	February 28 2018	March 30, 2018
Dispositive Motions	March 27, 2018	April 26, 2018
Pre-Trial Order	April 26, 2018	May 25, 2018

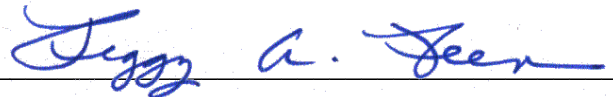
This extension is reasonable and necessary given the good cause set forth above.

**IT IS SO STIPULATED.**

Respectfully submitted this 29th day of January, 2018.

Ballard Spahr LLP  By: <u>/s/ Russell J. Burke</u> Abran Vigil, Esq. NV Bar No. 7548 Russell J. Burke, Esq. NV Bar 12710 1980 Festival Plaza Drive, Suite 900 Las Vegas, NV 89135 <i>Attorneys for JPMorgan Chase Bank, N.A.</i>	Hall, Jaffe & Clayton, LLP  By: <u>/s/ Ashlie L. Surur</u> Ashlie L. Surur, Esq. NV Bar No. 11290 7425 Peak Drive Las Vegas, NV 89128 <i>Attorneys for Sutter Creek Homeowners' Association</i>
Kim Gilbert Ebron  By: <u>/s/ Diana S. Ebron</u> Diana S. Ebron, Esq. NV Bar No. 10580 7625 Dean Martin Drive, Suite 110 Las Vegas, NV 89139 <i>Attorneys for SFR Investments Pool 1, LLC</i>	

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE  
DATED: February 2, 2018

<sup>3</sup> See Scheduling Order, ECF No. 36.